

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
MIDLAND DIVISION**

**FILED**

February 06, 2025

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

BY: KG  
DEPUTY

Matthew Pease,  
Plaintiff,

v.

Securities and Exchange Commission, Financial Industry Regulatory Authority, Depository  
Trust & Clearing Corporation, OTC Markets Group, John Brda, Gregory McCabe, Next Bridge  
Hydrocarbons, Inc.,  
Defendants.

Civil Action No. 7:24-CV-00322-DC  
Hon. Judge David Counts

**PLAINTIFF'S MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT**

TO THE HONORABLE DAVID COUNTS, UNITED STATES DISTRICT JUDGE:

Plaintiff Matthew Pease, proceeding pro se, respectfully moves this Court for leave to file a  
Second Amended Complaint pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure  
and states as follows:

**I. INTRODUCTION**

1. Plaintiff, acting pro se, is diligently refining this case and has gained a deeper understanding of the legal and factual issues since filing the First Amended Complaint.
2. Plaintiff has made substantial revisions to clarify claims, streamline allegations, and strengthen legal arguments to comply with federal pleading standards.
3. Plaintiff also seeks to remove two defendants from the case, which will narrow the scope of the litigation and promote judicial efficiency.

4. These amendments are made in good faith, are not for the purpose of delay, and will facilitate the proper adjudication of this matter.

## **II. LEGAL STANDARD**

5. Under Federal Rule of Civil Procedure 15(a)(2), courts should freely give leave to amend pleadings when justice so requires.
6. The Fifth Circuit follows a liberal amendment policy, particularly for pro se litigants, allowing them reasonable latitude in refining their pleadings.
7. Leave to amend should be granted absent a showing of undue delay, bad faith, repeated failure to cure deficiencies, or undue prejudice to the opposing party.
8. None of these factors apply here. Plaintiff seeks leave in good faith, without undue delay, and with the intention of improving the clarity and efficiency of this litigation.

## **III. ARGUMENT**

9. Plaintiff, as a pro se litigant, is actively refining this case to present clear and well-supported claims. Courts afford pro se litigants reasonable latitude to amend their pleadings, particularly when doing so promotes judicial efficiency.
10. The proposed Second Amended Complaint removes two defendants, reducing the complexity of the litigation and focusing the case on the proper claims. This benefits both the Court and the remaining parties.
11. There is no undue delay or prejudice to the Defendants. This case remains in the early stages, and no dispositive motions have been ruled upon.
12. Allowing amendment at this stage serves the interests of justice by ensuring that the case proceeds with only the necessary parties and properly pleaded claims.

#### IV. CONCLUSION

13. Plaintiff has acted in good faith and has not engaged in undue delay or dilatory tactics.
14. The amendments in the proposed Second Amended Complaint will streamline the litigation, eliminate unnecessary parties, and enhance the clarity of Plaintiff's claims.
15. For these reasons, Plaintiff respectfully requests that this Court grant leave to file the attached Second Amended Complaint and enter an order accepting it as the operative pleading.

#### PRAYER FOR RELIEF

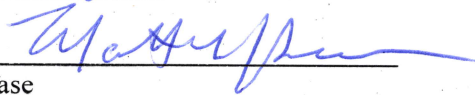
WHEREFORE, Plaintiff respectfully requests that this Court:

16. Grant this Motion for Leave to File a Second Amended Complaint;
17. Direct the Clerk to accept the Second Amended Complaint for filing; and
18. Grant such other and further relief as this Court deems just and proper.

Respectfully submitted,

Matthew Pease  
1 Cobbler Lane  
Amherst, NH 03031  
603 465-1110  
matt@matthewpease.com  
Pro Se Plaintiff

Dated: February 6, 2025

Signature:   
Matthew Pease